

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

AKIRA TECHNOLOGIES, INC.,

Plaintiff,

v.

CONCEPTANT, INC., *et al.*

Defendants.

Civil Action No. 1:17cv00412 (LO/IDD)

**PLAINTIFF / COUNTERCLAIM DEFENDANT AKIRA'S OBJECTIONS
TO DEFENDANT/ COUNTERCLAIM PLAINTIFFS' EXHIBIT LIST**

The Plaintiff, by counsel, pursuant to this Court's scheduling orders and the Local Rules of the United States District Court for the Eastern District of Virginia, submits the following objections to the defendant / counterclaim plaintiff's Exhibit List. Plaintiff reserves the right to amend or modify any of the objections set forth herein on the basis of any stipulation entered into by the parties; corrections, revisions or other modifications to the underlying exhibits; or any order from the Court impacting admissibility.

Plaintiff objects to the introduction of exhibits that are not properly authenticated, but is willing to confer with the defendants regarding means to resolve authenticity objections in advance of trial. However, even in instances where a stipulation as to authenticity may be reached, and unless otherwise noted, the plaintiff reserves all other objections to admissibility including, but not limited to, objections based on lack of foundation, hearsay and relevance.

CODE	OBJECTION
U	Incomplete; the introduction of any remaining portions ought, in fairness, to be considered contemporaneously (Fed. R. Evid. 106).
R	Relevance (Fed. R. Evid. 402).
M	Misleading; undue prejudice; confusion of issues; waste of time (Fed. R. Evid. 403).
F	Personal knowledge; lack of foundation (Fed. R. Evid. 602).
L	Lay opinion or legal conclusion; the exhibit contains an impermissible opinion by a lay witness that is not reasonably based on perception or helpful to a clear understanding of the witness' testimony or to the determination of a fact in dispute (Fed. R. Evid. 701).
H	Hearsay; the exhibit is a statement made by one other than the witness while testifying at trial, offered into evidence to prove the truth of the matter asserted, and not subject to any hearsay exception (Fed. R. Evid. 801 and 802).
A	Authentication; exhibit has not been properly authenticated (Fed. R. Evid. 901).
B	Best evidence; the exhibit is objectionable because it is vague and ambiguous as to whether the witness is summarizing his or her own independent understanding of the contents of the document (Fed. R. Evid. 1001-1004).
E	Exhibit is objectionable because it constitutes attempted expert testimony from a person who was not designated as an expert (Fed. R. Civ. P. 26)
D	Untimely; exhibit not provided during the discovery process.

Plaintiff makes the following objections to the defendants' proposed exhibits:

Number	Description	Obj
1	Akira At-Will Employment Agreement of Joshua Phipps, 9/26/11 (AKIRA 60009-12)	

Number	Description	Obj
2	Akira Employment Agreement of Josh Phipps, 2/1/16 (AKIRA 60034-47)	
3	Akira At-Will Employment Agreement of Lisa Houle, 10/13/11 (AKIRA 60053-5)	
4	Akira At-Will Employment Agreement of Lisa Houle, 1/12/15 (AKIRA 16-22)	
5	Letter from Liang to Andrey Mikhalkuk re job offer/acceptance, 10/3/12 (AKIRA 24-5)	
6	Akira At-Will Employment Agreement of Andrey Mikhalkuk, 10/10/12 (DEF 8781-5)	
7	Email chain between Phipps and Chennamaraja re: FDA BAA and relevance of tranSMART or Big Data Approach, 9/12/12 (AKIRA 140-140-1)	
8	Email from Liang to Chennamaraja and Phipps re: Fwd: tranSMART Project at FDA – Update, Timing and Next Steps, with Attachments FDA-Pharmacogenomic-tranSMART-Instance-and-Sandbox.docx, FDA BAA-12-00118.pdf, FDA's Regulatory Science Strategic Plan corrected 8-17-11.pdf, 9/14/12 (AKIRA 164471-544)	
9	Fbo.gov listing of FDABAA-13-00119 (DEF 10856-7)	A
10	Email chain between Phipps and Chennamaraja re: missed this one, 6/13/13 (AKIRA 139-139-1)	
11	FDABAA-13-00119 (AKIRA 142-177)	
12	Email from Houle to Chennamaraja, Phipps and Liang re: BD Call Spreadsheet, with Attachment 2014016 – New Business Opportunities for Review.xlsx, 1/6/14 (AKIRA 68386-416)	
13	Email from Liang to Chennamaraja, Fitzpatrick, Phipps, Houle, Munley and Siddiqui re: For Akira: current contracts dashboard and pipeline of opportunities in source selection as of 9/6/2014, with Attachments Dashboard of Existing Contracts 09-06-2014.pptx and Pipeline as of 09-06-2014 (sorted by anticipated award date, includes only proposals in source selection).pptx, 9/6/14	

Number	Description	Obj
	(AKIRA 134578-89)	
14	Email chain among Chennamaraja, Phipps, Fitzpatrick, Liang, Hamill, and Grafmyre re: Fwd: eBER project management – Thank you!, 9/25/14	H
	(AKIRA 257872-3)	
15	Email chain between Liang and Dorsey re: Re: Snowden: Dump Dropbox, 1/16/15	H, R
	(AKIRA 156129)	
16	Proposal for Business Informatics for Office of Regulatory Affairs (ORA), Volume I: Technical Proposal, 8/27/15	
	(AKIRA 169172-226)	
17	Email chain among Chennamaraja, Sartain, Boo, and Houle re: Fwd: eBER project management – Thank you!, 9/25/14- 10/15/15 (AKIRA 270053-6)	H
18	Email chain among Chennamaraja, Sartain, Boo, Houle, Fitzpatrick,	H
	Phipps, and Grafmyre re: Fwd: FW: Thank you!, 10/15/15 (AKIRA 270057)	
19	Email chain between Chennamaraja and Johnson re: Re: CBER, 10/15/15	H
	(AKIRA 270075-6)	
20	Fbo.gov listing of FDABAA-16-00122 (DEF 11335-6)	A
21	FDABAA-16-00122 (AKIRA 179-220)	
22	Email from Handberg to Phipps, Liang, Peter, Dunbar, Chennamaraja, Wilds re: 5-09-16 Pipeline Report, with Attachment 2016 05 09 Pipeline Report.xlsx, 5/9/16	H
	(AKIRA 68626-39)	
23	Email from Handberg to Chennamaraja cc: Phipps, Liang, Peter, Fitzpatrick, Dunbar, Wilds re: Re: 5-16-16 Pipeline Report, with Attachment 2016 05 16 Pipeline Report.xlsx, 5/16/16	H
	(AKIRA 69721-828)	
24	Email from Handberg to Chennamaraja cc: Phipps, Liang, Peter, Dunbar, Chennamaraja, Wilds re: Pipeline Report, with Attachment 2016 05 23 Pipeline Report.xlsx, 5/23/16	H
	(AKIRA 70816-33)	

Number	Description	Obj
25	Email from Liang to Fitzpatrick, Phipps, Peter cc: Dunbar, Siddiqui, Grossman, Roth, Boo re: IMPORTANT: Regarding the Small Business Setaside Rule, 6/3/16 (AKIRA 7690-1)	
26	Email from Handberg to Phipps, Chennamaraja, Liang, Peter, Fitzpatrick, Dunbar, Wilds re: Pipeline Report, with Attachment 2016 06 06 Pipeline Report.xlsx, 6/6/16 (AKIRA 71074-92)	H
27	Email from Handberg to Phipps, Chennamaraja, Liang, Peter, Fitzpatrick, Dunbar, Wilds re: Pipeline Report, with Attachment 2016 13 06 Pipeline Report.xlsx, 6/13/16 (AKIRA 76301-19)	H
28	Email chain between Liang and Chennamaraja re: Re: DLA JETS non- selection, debriefing, and debriefing analysis & a question, 6/16/16- 6/17/16 (AKIRA 152477-8)	
29	Email from Handberg to Phipps, Chennamaraja, Liang, Peter, Fitzpatrick, Dunbar, Wilds re: June 20 2016 Pipeline Report, with Attachment 2016 20 06 Pipeline Report.xlsx, 6/20/16 (AKIRA 81528-46)	H
30	Email from Handberg to Phipps, Chennamaraja, Liang, Peter, Fitzpatrick, Dunbar, Wilds re: June 27 2016 Pipeline Report with Attachment 2016 06 27 Pipeline Report.xlsx, 6/27/16 (AKIRA 86755-73)	H
31	Conceptant, Inc. Full Technical Proposal FDA Population Health and Product Safety Platform FDABAA-16-00122, 7/6/16 (AKIRA 76-135)	
32	Email from Houle to FDABAA re: Research Area #5 FDABAA-16- 00122 Update, 7/8/16 (DEF 524)	
33	Conceptant Full Technical Proposal re: FDABAA-16-00122, 8/31/16 (DEF 1185-1268)	
34	Conceptant Cost Proposal re: FDABAA-16-00122, 8/31/16 (DEF 1269-1281)	
35	Email from Handberg to Dunbar, Liang, Roth, Wilds, Fitzpatrick, Phipps, Boyce, and Chennamaraja re: BD Pipeline Meeting, with Attachment 2016_12_05 Pipeline Report.xlsx, 12/5/16 (AKIRA 96730-56)	H

Number	Description	Obj
36	Employee Termination record for Phipps (AKIRA 60051)	
37	Email chain among Liang, Phipps, Chennamaraja, Roth, Fitzpatrick, Peter, Wilds, Sidiqii, and Dunbar re: JOSH: Please look at this, 7/27/16-8/1/16 (AKIRA31-31-2)	H
	Email chain among Dunbar, Phipps, Lloyd, et al. re: Fwd: Letters of Commitment and Resumes needed for Akira's Continuing Work for FDA ORA, with Attachment Letter of Commitment, 8/16/16 (AKIRA 100021-3)	
39	Email from Liang to Phipps, Houle, Dunbar, Chennamaraja, Grossman re: LEVEL OF EFFORT (LOE) AND PRICING WORKSHEET FOR SOLICITATION # 16-223-SOL-00106 "DIGITAL MANAGEMENT AND BUSINESS SOLUTION SUPPORT FOR OFFICE OF	
	REGULATORY AFFAIRS (ORA), V1, with Attachment LOE and Pricing Workbook – Solicitation 16-223-SOL-00106.xlsx, 8/18/16 (AKIRA 100027-41)	
40	Email chain between Liang and Houle re: Re: DOMESTICS: Please review very quickly, with Attachment FDA ORA Domestics Pricing – Red Team v4.xlsx, 8/23/16 (AKIRA 100185-201)	
	Email from Houle to Liang re: Domestics Staffing Matrix, 8/24/16 (AKIRA 180044-5)	
42	Email chain between Liang and Houle re: Re: Domestics Staffing Matrix, with Attachment FDA ORA Domestics Pricing – Red Team v6.xlsx, 8/24/16 (AKIRA 100224-33)	
	Email from Dunbar to Chennamaraja, Roth, Liang, Fitzpatrick, Phipps, Peter, Wilds, and Sidiqii, with Attachment IT 70 opps 9-12.docx, 9/12/16 (AKIRA 127284-9)	
44	Email from Dunbar to Chennamaraja, Roth, Liang, Fitzpatrick, Phipps, Wilds, and Sidiqii re Daily Opps Summary, with Attachments 8a Stars opps 9-27.docx and IT 70 opps 9-27.docx, 9/27/16 (AKIRA 127319-25)	
	Email chain among Liang, Chennamaraja, Boyce, Roth, Phipps, and Dunbar re: Re: FDA CFSAN, 10/7/16	H

Number	Description	Obj
	(AKIRA 7692-6)	
46	Email chain among Liang, Chennamaraja, Boyce, Roth, Phipps, and Dunbar re: Re: FDA CFSAN, 10/7/16	H
	(AKIRA 7697-700)	
47	Email chain among Boyce, Phipps, Chennamaraja, Dunbar, Liang, and Roth re: Re: GSA, 10/12/16-10/17/16	H
	(AKIRA 5192-5)	
48	Email chain among Boyce, Chennamaraja, Phipps, Dunbar, Liang, and Roth re: Re: GSA, 10/12/16-10/17/16	H
	(AKIRA 5196-8)	
49	Email chain among Chennamaraja, Liang, Boyce, Phipps, Dunbar, and Roth re: Re: GSA, 10/12/16-10/17/16	H
	(AKIRA 5207-10)	
50	Email chain among Houle and Boyce re: Re: Draft Minutes and Question for you, 10/24/16-10/25/16	H
	(AKIRA 100266-8)	
51	Email from Mikhalchuk to Chennamaraja re: Notes, 10/31/16 (AKIRA 7776)	
52	Email with notes by Mikhalchuk re: outline, 11/3/16 (AKIRA 134219)	
53	Email from Dunbar to Phipps and Liang re: Fwd: Pipeline pull, with Attachment Pipeline report 11-3.xlsx, 11/3/16	
	(AKIRA 92414-32)	
54	Email chain among Chennamaraja and Roth re: Re: Presentation tomorrow, with Attachment Company Offsite – Strategy Slides Updated.pptx, 11/3/16-11/4/16	H
	(AKIRA 135510-26)	
55	Management Offsite – Health and Civilian Programs, Sustainability and Growth Discussion	
	(AKIRA 60436-43)	
56	Letter from Boyce to Houle re: Earnings Increase, 11/7/16 (AKIRA 60063)	H, R
57	Email from Mikhalchuk to Roth re: compensation, 11/7/16 (AKIRA 100281)	
58	Email chain among Chennamaraja, Roth, and Mikhalchuk re: Re: FW:	H

Number	Description	Obj
	FW: Andrey's signed offer letter, 10/3/12-11/7/16 (AKIRA 7753-63)	
59	Email from Handberg to Dunbar, Liang, Chennamaraja, Wilds, Phipps, Fitzpatrick, Roth, and Boyce re: ATTENTION THIS MORNING: Prepare for Pipeline Meeting, with Attachment 2016_11_14 Pipeline Report.xlsx, 11/14/16	H
	(AKIRA 93577-94)	
60	Email from Handberg to Dunbar, Liang, Chennamaraja, Wilds, Phipps, Fitzpatrick, Roth, and Boyce re: ATTENTION THIS MORNING: Prepare for Pipeline Meeting, with Attachment 2016_11_28 Pipeline Report.xlsx, 11/28/16	H
	(AKIRA 95026-49)	
61	Email chain among Chennamaraja, Johnson, Roth, Boyce, and Phipps re: Fwd: Resignation Letter, 11/28/16	H
	(AKIRA 60048-9)	
62	Sales by Customer Detail, January through December 2016 (AKIRA Native 24)	U
63	Fbo.gov listing of FDABAA-17-00123N (DEF 10858)	A
64	SAM search results for NuCognition (DEF 11227)	A, R
65	Akira Technologies, Inc. Employee Handbook (AKIRA0138048-105)	
66	Chart of contracts and Akira Labs Prototypes and Demos (AKIRA 240468-74)	R
67	Summary chart of BAA postings	A, D, B
68	Search results of Opportunities on www.fbo.gov, highlighted to show BAAs	A
	(DEF010624-855)	
69	Semantic Layer Integration with eHMP (DEF011321)	R
70	OSEHRA Terms of Service (DEF011322-32)	R
71	Creative Commons license (DEF011333)	R
72	Business Rules and Business Process Management Platform Implementation with eHMP (DEF011334)	R
	(DEF011334)	
73	Executive Summary (DEF010611-13)	R
74	Patient Data (DEF010614)	R
75	Med 4 All Features and Functionality (DEF010615-8)	R

Number	Description	Obj
76	Portable Personal Medical Record and Alert System (DEF010619-21)	R
77	Med 4 All electronic files (DEF010622)	R
78	Med 4 All electronic files (DEF010623)	R
79	ISO 9001:2008 / CMMI – 3 Quality Manual (DEF011168-203)	R
80	Technatomy Corporation ISO 9001:2008 Forms (DEF011215-6)	R
81	Master Documents List (DEF011217-26)	R
82	Organizational Process Group (DEF011229-34)	R
83	Risk Management Plan (DEF011235-41)	R
84	Internal Audit Checklist – Product Delivery Process (DEF011242-4)	R
85	Email chain among Phipps, Liang, Chennamaraja, Houle, and Fitzpatrick re: Re: salaries, 4/22/14-4/23/14 (AKIRA 7230-3)	H
86	Email from Phipps to Chennamaraja re: Health Practice Plan (updated), with Attachment 20141014 – Akira Health Practice Updates – Q4 2014 update.pptx, 10/14/14 (AKIRA 137680-92)	
87	Email chain between Phipps and Grossman re: Re: Project Summaries and Proxy Jira list for Amy, 5/31/16 (AKIRA 2602-4)	H
88	Email chain between Phipps and Kelemework re: FW: BPR and CMS, 7/31/12 (DEF 11205)	
89	ORA wide Business Process Reengineering Initiative and Compliance Management System (CMS) Technical Support, 7/31/12 (DEF 11206-9)	A
90	Email chain among Liang, Phipps, Chennamaraja, and Adapa re: Proposal templates for the CMS proposal, 9/9/12-9/10/12 (AKIRA 138235)	H
91	Email from Liang to Phipps, Adapa, and Chennamaraja re: New templates for the FDA ORA CMS project response, 9/10/12 (AKIRA 138236)	
92	Solicitation/Contract/Order for Commercial Items (AKIRA 294814-60)	

Number	Description	Obj
93	Email chain among Liang, Kelemework, Phipps, Adapa, and Chennamaraja re: Re: A copy of ORA kickoff presentation, 10/9/12 (AKIRA 138232-4)	H
94	Transaction Detail by Account, January through December 2012 (AKIRA Native 36)	U
95	Chat between Chennamaraja and Phipps, 1/29/13 (AKIRA 8521)	
96	Transaction Detail by Account, January through December 2013 (AKIRA Native 37)	U
97	Chat between Phipps and Liang, 1/23/16 (AKIRA 7880-6)	
98	Solicitation / Contract / Order for Commercial Items (AKIRA 138237-72)	
99	Amendment of Solicitation/Modification of Contract, effective 8/17/12 (AKIRA 138273-307)	
100	Amendment of Solicitation/Modification of Contract, effective 5/6/13 (AKIRA 138308-44)	
101	Email from Chennamaraja to Phipps re: your Capture Bonus for FDA follow on work, 6/25/13 (DEF 11166)	
102	Email chain among Ohatnick, Chennamaraja, and Phipps re: From FDA, 8/22/13 (AKIRA 138353-6)	H
103	Email chain among Liang, Phipps, Chennamaraja, Lloyd, and Ohatnick re: Bill Lloyd's content (for Josh to insert into the Volume 1 template), 8/27/13-9/1/13 (AKIRA 138357-60)	H
104	Email chain among Ohatnick, Chennamaraja, and Phipps re: Final RfTOP for ORA IT Support, 9/6/13-9/13/13 (AKIRA 138345-52)	H
105	Email chain among Liang, Phipps, and Chennamaraja re: JOSH: REST OF THIS WEEK AND MONDAY!, 9/3/13-9/4/13 (AKIRA 138174-87)	
106	Email chain among Liang, Chennamaraja, Phipps, and Fitzpatrick re: Guys! Look at this! Hubzone setaside for Project Management from FDA CBER released yesterday as an RFP!, 9/1/13-9/2/13 (AKIRA 138188-9)	H
107	Email chain among Chennamaraja, Phipps, and Liang re: Re: JOSH:	

Number	Description	Obj
	REST OF THIS WEEK AND MONDAY!, 9/3/13 (AKIRA 250973-4)	
108	Email chain among Chennamaraja, Phipps, and Liang re: Re: JOSH:	
	REST OF THIS WEEK AND MONDAY!, 9/3/13 (AKIRA 250975-6)	
109	Email chain among Liang, Phipps, Chennamaraja, Fitzpatrick, and Houle re: FDA CBER PMSS contract RFP documents, 9/3/13-9/6/13 (AKIRA 138143-53)	H
110	Email chain among Liang, Phipps, and Chennamaraja re: JOSH: REST OF THIS WEEK AND MONDAY!, 9/3/13-9/4/13	
	(AKIRA 138174-87)	
111	Email chain among Liang, Phipps, and Chennamaraja re: Template for CDER PMSS proposal, 9/4/13-9/6/13	
	(AKIRA 138165-73)	
112	Email from Liang to Houle, Phipps, and Chennamaraja re: ORA BITS Support – original SOW and original Akira Proposal (for use in cutting & pasting into CBER PMSS proposal (including past performance section), with Attachments FDA ORA BITS Support contract SOW.pdf, FINAL PROPOSAL – Volume I – Technical Approach (clean) – 09-21-2011.pdf, REVISED PROPOSAL – Volume I –	
	Technical Approach (red-lined) – 09-13-2011.docx, 9/6/13 (AKIRA 135330-477)	
113	Email chain among Liang, Phipps, and Chennamaraja re: Revised Templates for CBER PMSS proposal, 9/6/13-9/7/13	
	(AKIRA 138157-62)	
114	Chat between Phipps and Houle, 9/8/13 (AKIRA 8456-60)	
115	Chat between Phipps and Chennamaraja, 9/8/13 (AKIRA 8455)	
116	Email chain between Phipps and Liang re: Re: Josh, for my pricing, please fill in items in yellow, 9/7/13-9/8/13	
	(AKIRA 251261)	
117	Email chain among Phipps, Chennamaraja, Liang, Houle, and Lloyd re: last round of questions are out, 9/9/13	
	(AKIRA 138154-6)	
118	Chat between Phipps and Houle, 9/9/13 (AKIRA 8451-3)	
119	Chat between Phipps and Houle, 9/9/13 (AKIRA 8449-50)	

Number	Description	Obj
120	Email chain among Lloyd, Houle, Liang, Chennamaraja, and Phipps re:	H
	Re: New Master, 9/9/13 (AKIRA 138223-4)	
121	Chat between Houle and Phipps, 9/10/13 (AKIRA 8436-48)	
122	Chat between Houle and Phipps, 9/10/13 (AKIRA 8435)	
123	Chat between Houle and Phipps, 9/11/13 (AKIRA 8421-33)	
124	Chat between Chennamaraja and Phipps, 9/11/13 (AKIRA 8434)	
125	Chat between Houle and Phipps, 9/11/13 (AKIRA 8417)	
126	Proposal for FDA/CBER Project Management Support Services,	
	Volume I: Technical Proposal, 9/11/13 (AKIRA 174906-36)	
127	Proposal for FDA/CBER Project Management Support Services,	
	Volume II: Past Performance, 9/11/13 (AKIRA 174065-77)	
128	Email chain among Chennamaraja, Phipps, Liang, Chowdhary, Houle, and Lloyd re: Re: CBER submitted and confirmed, 9/11/13 (AKIRA 251488)	H
	(AKIRA 251534)	
129	Email chain among Chennamaraja, Phipps, Liang, Fitzpatrick, and Houle re: Re: CBER IS A WIN!!!!!, 9/25/13	H
	(AKIRA 251534)	
130	Solicitation/Contract/Order for Commercial Items (AKIRA 294861-8)	
131	Email chain among Gangi, Liang, Chennamaraja, and Phipps re: RE:	H
	Invoicing, 9/20/13-9/27/13 (AKIRA 251565-6)	
132	Email chain among Gangi, Liang, Chennamaraja, and Phipps re: RE:	H
	Invoicing, 9/20/13-9/27/13 (AKIRA 251567-8)	
133	Email chain between Liang and Phipps re: Re: 9 th , 10/4/13 (AKIRA 251633-4)	
134	Email chain between Phipps and Liang re: RE: 9 th , 10/4/13 (AKIRA 251638-41)	
135	Transaction Detail By Account, January through December 2013 (AKIRA Native 34)	U
136	Chat between Phipps and Houle, 1/21/14 (AKIRA 8234-41)	
137	Chat between Phipps and Houle, 4/22/14 (AKIRA 8107-25)	

Number	Description	Obj
138	Email chain between Chennamaraja and Liang re: Re: ODesk, 5/6/14 (AKIRA 254557-8)	
139	Email chain between Chennamaraja and Liang re: Re: ODesk, 5/6/14 (AKIRA 254562-4)	
140	Email chain among Sieg, Phipps, Fitzpatrick, Bienvenu, Fitzpatrick, Chennamaraja, and Mantell re: Akira Performance Issues & Response, 7/21/14 (AKIRA 138230-1)	H
141	Email from Fitzpatrick to Phipps, Houle, Wilson, Johnson, and Chennamaraja re: CBER bonuses, 10/9/14 (DEF 11156)	H
142	Transaction Detail By Account, January through December 2014 (AKIRA Native 35)	U
143	Contractor Performance Assessment Report (CPAR) (AKIRA 138219-22)	
144	Chat between Chennamaraja and Phipps, 2/28/13 (AKIRA 8519)	
145	Email from Phipps to Chennamaraja, Liang, and Houle re: Capabilities list for ORA services, with Attachment Akira Business Offerings.docx, 1/23/14 (DEF 100282-4)	
146	Email from Chennamaraja to Phipps, Liang, and Houle re: Re: Capabilities list for ORA services, 1/23/14 (AKIRA 5514)	
147	Email chain between Phipps and Kelemework re: Re: can you please verify that this is the level of detail and worded the way you need, 2/9/14 (DEF 11210-1)	
148	Email from Phipps to Kelemework re: update, 2/10/14 (DEF 11214)	
149	Email from Houle to Phipps re: ORA PP, with Attachments Past Performance Writeup FDA.docx, FDA Business Information Technology Management Staff.docx, Data Call #2 FADS Akira FDA.docx, Akira ORA Experience narrative.docx, 4/22/14 (AKIRA 66794-66850)	
150	Email chain between Phipps and Kelemework re: Re: quick question, 5/1/14 (DEF 11212)	

Number	Description	Obj
151	Email chain among McCarthy, Chennamaraja, Phipps, Fitzpatrick, and Lloyd re: U.S. FDA – Statements of Work for review, 5/19/14-7/9/14 (AKIRA 138273-82)	H
152	Email chain among Phipps, Houle, Chennamaraja, Lloyd, Fitzpatrick Liang, and McCarthy re: Fwd: U.S. FDA / Akira Technologies – Request for Quotation, with Attachments RFP – Proposal Instructions.doc, SOW – RFP – 7.14.docx, 7/14/14 (AKIRA 100670-715)	H
153	Email chain among Lloyd, Liang, Phipps, Chennamaraja, Fitzpatrick, Houle, and McCarthy re: Re: RE: U.S. FDA / Akira Technologies – Request for Quotation, 7/21/14 (AKIRA 5743-5)	H
154	Email from Lloyd to Phipps, Chennamaraja, Liang, and Fitzpatrick re: ORA Volume 1 Productin, with Attachments 20140718-0300 – Business Informatics Support – Volume I – wjl v0 2.docx, Resume William Lloyd v0 1.docx, 7/23/14 (AKIRA 135575-93)	H
155	Email from Phipps to Houle re: ORA BIS for review, with Attachments 20140724-0900 – Business Informatics Supprt – Volume I – DRAFTV1.docx, RFP – Proposal Instructions.doc, SOW – RFP – 7.14.docx, 7/24/14 (AKIRA 100761-838)	
156	Email from Houle to Houle re: ora proposal, with Attachments 20140724-1100 – Business Informatics Supprt – Volume I – DRAFTV1-LH.docx, RFP – Proposal Instructions.doc, SOW – RFP – 7.14.docx, 7/24/14 (AKIRA 100839-914)	
157	Award/Contract for Contract No. HHSF223201400164C, effective 9/24/14 (AKIRA 138283-342)	
158	Email chain among Chennamaraja, Liang, and Phipps re: Fwd: time to talk about sales bonus for the ORA work, 10/12/14 (AKIRA 7766)	
159	Email chain between Chennamaraja and Phipps cc: Fitzpatrick re: Re: time to talk about sales bonus for the ORA work, 10/12/14 (DEF 11155)	

Number	Description	Obj
160	Email chain among Chennamaraja, Liang, Fitzpatrick, and Phipps re: RE: time to talk about sales bonus for the ORA work, 10/12/14 (AKIRA 258012-3)	H
161	Email chain among Phipps, Chennamaraja, and Fitzpatrick re: Re: time to talk about sales bonus for the ORA work, 10/12/14 (AKIRA 7768-9)	H
162	Email chain among Chennamaraja, Liang, Fitzpatrick, and Phipps re: Re: time to talk about sales bonus for the ORA work, 10/12/14 (AKIRA 258018-20)	H
163	Email chain among Chennamaraja, Liang, Fitzpatrick, and Phipps re: Re: time to talk about sales bonus for the ORA work, 10/12/14 (AKIRA 258035-9)	H
164	Email chain among Chennamaraja, Liang, and Phipps re: Fwd: health practice updates, 11/6/14-11/10/14 (AKIRA 137702)	
165	Email chain among Liang, Chennamaraja, and Phipps re: Re: ORA Imports pricing, 8/15/16 (AKIRA 2570-3)	
166	Email chain among Phipps, Grossman, Dunbar, and Grossman re: Re: Imports Technical Volume- FINAL- word version, 8/26/16 (AKIRA 135478-507)	H
167	Streamlined Pipeline Management (AKIRA 60095-114)	
168	ORA BIS Proposal Schedule v0.2 (from AKIRA Native 29)	
169	Email chain among Phipps, Chennamaraja, Liang, Fitzpatrick, and Houle re: Re: updates to the ORA BIS schedule, 7/25/14 (AKIRA 5750-1)	H
170	Email from Phipps to Wilson, Houle, Johnson, Mikhachuk re: ORA SOW, with Attachment SOW – RFP – 7.14.docx, 9/29/14 (AKIRA 5752-93)	H
171	Email from Houle to Phipps re: Volume 1, with Attachment Volume I- Technical Proposal- Akira Technologies, Inc. – FDA-1147420 V3- LH.docx, 8/24/15 (AKIRA 66964-7018)	
172	Email chain between Phipps and Houle re: RE: Hey There! How are things coming?, with Attachment Volume I- Technical Proposal- Akira Technologies, Inc – FDA01147420 V3-LH-JP.docx, 8/25/15	

Number	Description	Obj
	(AKIRA 67019-75)	
173	Award/Contract for Contract No. HHSF223201510173C (AKIRA 138240-66)	
174	Email chain among Chennamaraja, Phipps, and Liang re: Re: PLEASE REVIEW: CFSAN FARM Pricing, 1/25/14 (DEF 11160-1)	
175	Email chain among Lloyd, Wood, Phipps, Chennamaraja, and Fitzpatrick re: Opportunities at CFSAN, 5/6/15-5/7/15 (AKIRA 138197-200)	H
176	Email chain among Lloyd, Phipps, Wood, and Chennamaraja re: FDA CFSAN and Resource Library, 6/10/15 (AKIRA 138190-6)	H
177	Proposal for FSMA Assessment Tool (FAT), Volume I: Technical Proposal, 9/11/15 (AKIRA 246167-88)	
178	Sales by Customer Detail, January through December 2015 (AKIRA 138112)	U
179	Sales by Customer Detail, January through December 2016 (AKIRA 138113-4)	U
180	Customer QuickReport, January 2011 through December 2017 (AKIRA 138116)	U
181	Email chain among Phipps, Dunbar, Chennamaraja, Liang, Roth, Peter, Wilds, and Sidiqii re: Re: JOSH: Please look at this, 7/27/16-8/1/16 (AKIRA 6502-9)	H
182	Email from Grossman to Phipps re: FDA ORA 1 Past Performance 1- pager, with Attachment FDA-ORA1- PP1page.docx, 6/8/16 (AKIRA 67416-8)	H
183	Email chain between Grossman and Phipps re: Re: FDA ORA 1 Past Performance 1-pager, with Attachments HHS-ASPE- PP1page.docx, FDA-ORA1-PP1page.docx, FDA-ORA2- PP1page.docx, FDA-ORA3- PP1page.docx, 6/8/16 (AKIRA 67419-25)	H
184	Chat between Grossman and Phipps, 7/5/16 (AKIRA 7851)	H
185	Chat between Grossman and Phipps, 7/6/16 (AKIRA 7850)	H
186	Chat between Phipps and Grossman, 7/7/16 (AKIRA 7849)	H
187	Chat between Grossman and Phipps, 7/21/16 (AKIRA 7845)	H
188	Chat between Grossman and Phipps, 7/29/16 (AKIRA 7842)	H

Number	Description	Obj
189	Chat between Grossman and Phipps, 8/10/16 (AKIRA 7834-6)	H
190	Email chain among Jones, STARS2, Creason, Chennamaraja, Phipps, Liang, Houle, Dunbar, Grossman, and Lloyd re: Import/ACE Informatics Support Services, 8/8/16-8/10/16 (AKIRA 138267-72)	H
191	Chat between Grossman and Phipps, 8/11/16 (AKIRA 7833)	H
192	Email chain among Liang, Phipps, Foust, Dunbar, and Houle re: Re: New sole source RFP from FDA ORA we need NTELX's help on, 8/12/16 (AKIRA 6994-7000)	H
193	Email from Phipps to Chennamaraja and Liang re: ORA Imports pricing, with Attachment Imports LOE V1 – full.xlsx, 8/15/16 (AKIRA 99828-32)	
194	Email from Phipps to Chennamaraja, Liang, Houle, and Peter re: Imports approach, with Attachment Imports LOE V1 – full.xlsx, 8/15/16 (AKIRA 99982-6)	
195	Email chain among Dunbar, Foust, Liang, and Phipps re: Re: FDA Imports question, 8/16/16 (AKIRA 7016-8)	H
196	Email chain among Dunbar, Phipps, Lloyd, et al. re: Fwd: Letters of Commitment and Resumes needed for Akira's Continuing Work for FDA ORA, with Attachment Letter of Commitment.docx, 8/16/16 (AKIRA 100021-3)	H
197	Email chain between Houle and Phipps re: Re: Domestics LOE, 8/20/16-8/21/16 (AKIRA 100082-3)	
198	Email chain among Phipps, Houle, Dunbar, Sriram, Taub, Mateti, and Liang re: Re: Letters of Commitment and Resumes needed for Akira Technologies, Inc.'s two FDA Sole Source Opportunities, 8/22/16 (AKIRA 7040-2)	H
199	Email chain among Liang, Houle, Phipps, Chennamaraja, and Dunbar re: Re: DOMESTICS: Please review very quickly, with Attachment FDA ORA Domestics Pricing – Red Team v4.xlsx, 8/23/16 (AKIRA 100185-201)	
200	Chat between Liang and Phipps, 8/24/16 (AKIRA 7820-1)	

Number	Description	Obj
201	Email from Houle to Liang and Phipps re: Updated Domestics Pricing V7, with Attachment FDA ORA Domestics Pricing – Red Team v7.xlsx, 8/24/16 (AKIRA 100234-42)	
202	Chat between Phipps and Houle, 8/24/16 (AKIRA 7817)	
203	Chat between Phipps and Houle, 8/25/16 (AKIRA 7813-4)	
204	Chat between Grossman and Phipps, 8/26/16 (AKIRA 7812)	H
205	Email chain among Phipps, Houle, and Liang re: Re: Please check tab #2 and see if this is what you wanted, with Attachment Akira – ORA Pricing Worksheet –Solicitation 16-223-SOL-00106 (rationalized to effective period of performance v2).xlsx, 9/19/16-9/26/16 (AKIRA 67952-69)	
206	Email chain among Liang, Chennamaraja, Houle, Phipps, Morrison, Boyce, Roth, and Nogas re: Re: What LCAT did we propose for Bill, with Attachment Akira – ORA Pricing Worksheet –Solicitation 16- 223-SOL-00106 (rationalized to effective period of performance v2).xlsx, 10/3/16 (AKIRA 67970-89)	H
207	Email chain among Liang, Houle, Chennamaraja, Phipps, Morrison, Boyce, Roth, and Nogas re: Re: What LCAT did we propose for Bill, with Attachment Akira – ORA Pricing Worksheet –Solicitation 16- 223-SOL-00106 (rationalized to effective period of performance v2).xlsx, 10/3/16-10/13/16 (AKIRA 68011-70)	H
208	Architecture Support Services White Paper.docx (from AKIRA Native 29)	
209	Architecture Support Services-Proposal Text.docx (from AKIRA Native 29)	
210	Data Management-Proposal Text.docx (from AKIRA Native 29)	
211	Document Management PM Support-Proposal Text.docx (from AKIRA Native 29)	
212	Requirements and Business Rules Gathering White Paper – JP2.docx (from AKIRA Native 29)	
213	Requirements and Business Rules Gathering White Paper – JP.docx (from AKIRA Native 29)	

Number	Description	Obj
214	Requirements and Business Rules-Proposal Text.docx (from AKIRA Native 29)	
215	PFP Governance White Paper – JP2.docx (from AKIRA Native 29)	
216	PFP Governance White Paper – JP.docx (from AKIRA Native 29)	
217	PFP Governance – Proposal Text.docx (from AKIRA Native 29)	
218	IQ Governance – Proposal Text.docx (from AKIRA Native 29)	
219	ACE Support Services – White Paper.docx (from AKIRA Native 29)	
220	ACE Support Services – Proposal Text.docx (from AKIRA Native 29)	
221	Chat between Chennamaraja and Phipps, 6/25/13 (AKIRA 8506-11)	
222	Email from Phipps to Houle re: CTP communications position, 4/28/14 (AKIRA 5545)	
223	Email chain among Chennamaraja, Fitzpatrick, Phipps, and Houle re:	H
	Re: Health Communication Specialist Candidates, 5/2/14 (AKIRA 5552-4)	
224	Email chain among Liang, Sidiqii, Chennamaraja, Fitzpatrick, Phipps, Houle, and Davis re: Add to SugarCRM: Center for Tobacco proposal due on Wednesday. Fwd: 113024 – Request for Quote-Health Communication Specialist, with Attachment 1130824 Health Comm Spec (Eval) SOW[1].doc, 4/23/14-5/5/14 (AKIRA 5555-62)	H
225	Email chain among Chennamaraja, Davis, Houle, and Phipps re:	H
	Resumes for CTP, 5/13/14-5/28/14 (AKIRA 138204-12)	
226	Email from Chennamaraja to Parikh and Kolla re: CTP capability matrix, 3/8/15 (AKIRA 259222)	U, R
227	Email chain between Chennamaraja and Baliff re: Re: Nice talking to you today., 9/19/14-3/13/15 (AKIRA 259282-3)	H

Number	Description	Obj
228	Email from Haddad to Phipps, VandeSand, and Miller re: CTP Data Call #1 & 2, with Attachments CTP Past Performance Evaluation – Data Call 1.xlsx, CTP Data Call 1.docx, CTP Data Call 2.docx, 3/23/15 (AKIRA 135527-35)	H, R
229	Sales by Customer Detail, January through December 2014 (AKIRA 138115)	U
230	Sales by Customer Detail, January through December 2016 (AKIRA 138117)	U
231	Customer QuickReport, January 2011 through December 2017 (AKIRA Native 17)	U
232	Email chain between Chennamaraja and Phipps re: Re: your salary increase, 3/16/12-3/17/12 (DEF 11164-5)	
233	Email from Chennamaraja to Phipps re: your Bonus, 10/2/12 (DEF 11163)	
234	Email chain between Chennamaraja and Phipps re: Re: bonus pay out, 4/20/13 (DEF 11162)	
235	Email chain between Chennamaraja and Phipps re: Re: approach to bonus pay out, 2/26/14 (DEF 11158-9)	
236	Email chain between Chennamaraja and Phipps re: Re: financial topics update, 4/10/14 (DEF 11157)	
237	Email chain among Chennamaraja, Mikhachuk, and Phipps re: Fwd: demo laptop for the Oracle stack, 4/24/13-4/25/13 (AKIRA 5511)	
238	Email from Chennamaraja to Phipps, Liang, and Houle re: Re: Capabilities list for ORA services, 1/23/14 (AKIRA 5514)	
239	Email chain between Chennamaraja and Phipps re: Re: Health Practice P&L for CY14 Q4, 12/7/14-12/13/14 (DEF 11153-4)	
240	Email chain among Phipps, Mikhachuk, Liang, Chennamaraja, Sidiqii re: Re: Agile services mtg moved?, 1/26/15 (AKIRA 2720)	H, R
241	Email chain between Phipps and Chennamaraja re: Re: schedule for July, 6/26/15	

Number	Description	Obj
	(AKIRA 138163-4)	
242	Email chain among Phipps, Chennamaraja, Peter, and Mikhalchuk re: Re: Nice Civilian Opportunity – we need to look at this closely –	R
	Support for Cloud.gov, 2/26/16-2/27/16 (AKIRA 6354-8)	
243	Email chain among Peter, Phipps, and Lanier re: Fwd: Akira Capabilities Brief, with Attachment Akira Health It Briefv3.pptx, 5/4/16-5/22/16	H, R
	(AKIRA 6455-74)	
244	Email chain among Phipps, Dunbar, Houston, and Liang re: Re: Dept of State HR RFI, 8/2/16-8/5/16	H, R
	(AJURA 5099-108)	
245	Email from Grossman to Dunbar and Phipps re: Imports Technical Volume – FINAL – word version, with Attachment ORA Imports Technical-FINAL.docx, 8/26/16	H
	(AKIRA 68084-112)	
246	ORA Informatics Support Service Internal Contract Expectations Meeting	
	(AKIRA 60018-60044)	
247	ORA Informatics Support Service Contract Kickoff (AKIRA 60045-69)	
248	Calendar invitation and email between Phipps and Parikh re: FW:	A, H
	Catch-up with Josh re: ORA, 12/13/16-12/14/16 (DEF011273)	
249	Email chain between Phipps and Parikh re: Re: Catch-up with Josh re:	A, H
	ORA Files and Review of Activities, 12/15/16 (DEF011275)	
250	Email chain between Parikh and Phipps re: RE: Meetings List/Invites, 12/16/16	A, H
	(DEF011271)	
251	Email chain between Phipps and Parikh re: RE: Few quick questions, 12/20/16	A, H
	(DEF011261-2)	
252	Email chain between Phipps and Parikh re: RE: Few quick questions, 12/20/16-12/21/16	A, H
	(DEF011263-5)	
253	Email chain between Phipps and Parikh re: RE: Few quick questions, 12/20/16-12/21/16	A, H

Number	Description	Obj
	(DEF011266-7)	
254	Email chain between Parikh and Phipps re: RE: Few quick questions, 12/20/16-12/21/16	A, H
	(DEF011268-70)	
255	Calendar invitation from Parikh to Phipps re: Catch up with Josh, 12/21/16	A, H
	(DEF011272)	
256	Email chain between Parikh and Phipps re: RE: DAS Workshop Action Items & FL state onboarding, 12/15/16-12/23/16	A, H
	(DEF011256-60)	
257	Email confirmation from Spirit Airlines to Phipps re: Spirit Airlines Flight and Hotel Confirmation: WH2J7R, 2/27/16	A, H
	(DEF011313-8)	
258	Email confirmation from HIMSS to Phipps re: HIMSS Payment Receipt Details, 2/28/16	A, H
	(DEF011248)	
259	Registration Detail for Phipps for HIMSS (DEF011250)	A, H
260	Spirit Airlines Boarding Pass for Phipps, 2/28/16 (DEF011251)	A, H
261	Email from Lyft Ride Receipt to Phipps re: Your ride with Emmanuel on February 28, 2/29/16	A, H
	(DEF011310-1)	
262	Receipts for Brookwood Farms and CanyonRanch SpaClub (DEF011253)	A, H
263	Receipts from restaurants (DEF011252)	A, H
264	Email from Lyft Ride Receipt to Phipps re: Your ride with Michael on February 29, 2/29/16	A, H
	(DEF011306-7)	
265	Email from Lyft Ride Receipt to Phipps re: Your ride with Paul on February 29, 2/29/16	A, H
	(DEF011304-5)	
266	Email from Lyft Ride Receipt to Phipps re: Your ride with Xavier on March 1, 3/2/16	A, H
	(DEF011302-3)	
267	Email from Lyft Ride Receipt to Phipps re: Your ride with Edward on March 2, 3/2/16	A, H
	(DEF011300)	
268	Receipt from Caesars Las Vegas, 3/3/16 (DEF011254)	A, H

Number	Description	Obj
269	Email from Lyft Ride Receipt to Phipps re: Your ride with Joshua on March 2, 3/3/16 (DEF011298-9)	A, H
270	Invoice from Stratosphere, 3/3/16 (DEF011312)	A, H
271	Email from Lyft Ride Receipt to Phipps re: Your ride with Tim on March 3, 3/4/16 (DEF011296-7)	A, H
272	Email confirmation from OSEHRA to Phipps re: Registration Confirmed – 2016 OSEHRA Open Source Summit, 6/28/16 (DEF011319-20)	A
273	Chart of Phipps expenses, 1/1/16-10/31/16 (DEF011148-50)	
274	Email from Phipps to LAZParking re: cancellation of parking request, 10/31/16 (DEF011249)	A
275	Email chain among Chennamaraja, AP, Phipps, and Accounting Akira re: Fwd: Expense report for josh Phipps, with Attachment Joshua Phipps expenses from 012016 – 102016.xls, 10/31/16 (AKIRA 188699-709)	H
276	Email from Phipps to Akira and Boyce re: final expense payment, with Attachment Joshua Phipps expenses from 012016 – 102016.xls, 12/22/16 (DEF011276-9)	A, H
277	Email from Phipps to Akira and Boyce re: RE: final expense payment, with Attachment Joshua Phipps expenses from 012016 – 102016.xls, 12/22/16-12/23/16 (DEF011280-3)	A, H
278	Email chain among Chennamaraja, Phipps, Akira, Boyce, and Roth re: RE: final expense payment, 12/22/16-12/23/16 (DEF011284)	A, H
279	Email chain among Chennamaraja, Phipps, Akira, Boyce, and Roth re: RE: final expense payment, 12/23/16 (DEF011285-6)	A, H
280	Email chain among Phipps, Chennamaraja, and Boyce re: RE: Ur FDA Laptop and FDA badge..... URGENT, 12/23/16-1/4/17 (DEF011287-8)	H, R

Number	Description	Obj
281	Email chain among Phipps, Chennamaraja, Boyce, and DiDomenico re: RE: Ur FDA Laptop and FDA badge..... URGENT, 12/23/16-1/4/17 (DEF011289-92)	H, R
282	Email chain among Phipps, Chennamaraja, Boyce, and DiDomenico re: RE: Ur FDA Laptop and FDA badge..... URGENT, 12/23/16-1/5/17 (DEF011293-5)	H, R
283	Contract Revenue List with Sales by Customer Details (AKIRA 138106-37)	U
284	Email chain between Rusy, Liang, and Mikhachuk re: Re: ASPE website development, 8/9/14-8/11/14 (AKIRA 7536)	H
	Email chain between Rusy, Mikhachuk, and Liang re: Re: APSE website development, 8/9/14-8/12/14 (AKIRA 134234-7)	H
285	Email from Mikhachuk to Rusy and Liang re: Re: FW: Stakeholder coord, 8/14/14 (AKIRA 134240-1)	H
	Email from Mikhachuk to Liang re: ASPE proposal draft #2, with Attachment Concept Paper – 14-233-SOL-00490 – Akira – 08-07- 2014.docx, 8/15/14 (AKIRA 134244-53)	
286	Email from Mikhachuk to Rusy and Liang re: Re: Current proposal materials with Attachment Concept Paper – 14-233-SOL-00490 – Akira – 08-18-2014-Andrey.docx, 8/18/14 (AKIRA 134394-403)	H
	Email from Mikhachuk to Chennamaraja re: Tuesday, 8/18/14 (AKIRA 2156)	
287	Email from Mikhachuk to Chennamaraja cc: Liang re: Fwd: final price, with Attachments Copy of DHHS ASPE Pricing Table-PR- v6.xlsx and Concept Paper – 14-233-SOL-00490 – Akira – 08-19- 2014-Andrey.docx, 8/19/14 (AKIRA 61444-70)	
	Email from Mikhachuk to Siddiqui cc: Liang re: Please let me know when you finalize the technical section/file, with Attachment Concept Paper – 14-233-SOL-00490 – Akira – 08-09-2014-01.docx, 8/19/14 (AKIRA 134470-81)	

Number	Description	Obj
292	Email from Mikhalchuk to Liang, Chennamaraja, Fitzpatrick, Phipps cc: Siddiqui re: Re: ASPE: STAGE 2 PROTOTYPE STARTS IN THREE DAYS, 8/19/14 (AKIRA 134572-3)	
293	Redline of Public Website and Intranet Website and HHS Evaluation Database Application, Technical Approach/Concept Paper	H
	(AKIRA 242237-45)	
294	Redline of Public Website and Intranet Website and HHS Evaluation Database Application, Technical Approach/Concept Paper	H
	(AKIRA 242219-26)	
295	Redline of Public Website and Intranet Website and HHS Evaluation Database Application, Technical Approach/Concept Paper	H
	(AKIRA 242193-200)	
296	Draft of Public Website and Intranet Website and HHS Evaluation Database Application, Technical Approach/Concept Paper (AKIRA 242201-8)	
297	Proposal for Public Website and Intranet Website and HHS Evaluation Database Application Concept Paper (AKIRA 242173-82)	
298	Proposal for Public Website and Intranet Website and HHS Evaluation Database Application (AKIRA 242183-92)	
299	Proposal for Public Website and Intranet Website and HHS Evaluation Database Application (Technical Approach/Concept Paper) (AKIRA 242209-18)	
300	Proposal for Public Website and Intranet Website and HHS Evaluation Database Application, Concept Paper (AKIRA 242227-36)	
301	Email chain among Fitzpatrick, Mikhalchuk, Chennamaraja, and Liang re: Fwd: Brief Srinivas when you have time. All docs are here, with Attachments Original RFP to HC1028-14-T-0036.pdf, Akira's proposal for HC1028-14-T-0036.pdf, Akira's signed contract for HC1028-14-T-0036.pdf, 3/28/14-8/25/14 (AKIRA 142585-757)	H

Number	Description	Obj
302	Email chain between Saeed and Mikhachuk re: Re: Interview – Update, 9/3/14-9/4/14 (AKIRA 153844-7)	H, R
303	Email chain between Liang, Fialka, Mikhachuk, Dyakonova, cc: Yurevna re: Re: To: Darya or Maxim (re: Drupal project for Akira Technologies, Inc.), 9/3/14-9/10/14 (AKIRA 134628-9)	H, R
304	Email chain among CM, Mikhachuk, Phipps, Kirkwood, and Edgardo re: Fwd: Code sample, with Attachment sample.php, 9/11/14 (AKIRA 2084-6)	H, R
305	Email from Siddiqui to Mikhachuk cc: Liang re: ASPE Stage 2 – Technical Merit Template, with Attachment Technical Merit – 14-233- SOL-00490 – Akira – 09-16-2014-v1.docx, 9/16/14 (AKIRA 134733-41)	H
306	Email Mikhachuk to Fitzpatrick cc: Chennamaraja re: Re: Cogent, 9/17/14 (AKIRA 1056-7)	H
307	Email from Liang to Mikhachuk and Chennamaraja re: Fwd: ASPE Proposal v2, with Attachment Technical Merit – 14-233- SOL-00490 – Akira – 09-16-2014-v2.docx, 9/18/14 (AKIRA 134742-68)	H
308	Email chain among Mikhachuk, Rusy, and Liang re: Re: More, 9/19/14 (AKIRA 134769-70)	H
309	Email chain between Mikhachuk and Liang re: Re: PoC items, 9/20/14 (AKIRA 7558-60)	
310	Email from Mikhachuk to Liang and Siddiqui re: Re: Fwd: copyediting? with Attachment Technical Merit -14-233-SOL-00490 - Akira – 09-16-2014-v2 (edited)-Andrey.docx, 9/21/14 (AKIRA 134799-830)	H
311	Email chain between Rusy and Mikhachuk re: Re: Please let me know when convenient for site review, 9/21/14 (AKIRA 7565-6)	H

Number	Description	Obj
312	Email chain among Liang, Mikhalcjuk, Sidiqii, and Rusy re: Fwd: Technical Merit FINAL DRAFT – ASPE Stage 2 -, with Attachment Technical Merit – 14-233-SOL-00490 – Akira – 09-21-2014-FINAL	H
	DRAFT – v1.docx, 9/21/14 (AKIRA 134877-99)	
313	Email from Chennamaraja to Mikhalcuk re: Re: APSE URLs, 9/21/14 (AKIRA 7567)	
314	Email from Chennamaraja to Fitzpatrick re: Fwd: APSE URLs, 9/21/14 (AKIRA 7568)	
315	Email chain among Fitzpatrick, Park, Chennamaraja, and Mikhalcuk re: Fwd: ASPE URLs, 9/21/14 (AKIRA 7569-70)	H
	(AKIRA 7569-70)	
316	Email from Liang to Mikhalcuk forwarding email from Castleberry to Druk re: Fwd: 14-233-SOL-00490 Amendment 000001, with Attachments 14-233-SOL-00490 000001.pdf, HHS Section 508 Evaluation Template.pdf, 14-233-SOL-00490 000001 PRICING TABLE.rtf, 9/12/14-9/22/14	H
	(AKIRA 135000-29)	
317	Email from Mikhalcuk to Liang and Siddiqui re: Updated doc, with Attachment Technical Merit – 14-233-SOL-00490 – Akira – 09-21- 2014-FINAL DRAFT – v1PR (edited) – Andrey.docx, 9/22/14 (AKIRA 135030-56)	H
318	Email from Park to Fitzpatrick re: Re: ASPE URLs, 9/22/14 (AKIRA 7573-4)	H, R
319	Email chain among Mikhalcuk, Siddiqui, and Liang re: Re: Finalize please., with Attachment Technical Merit – 14-233-SOL-00490 – Akira – 09-22-2014 – FINAL DRAFT 3 – Andrey.docx, 9/22/14 (AKIRA 135080-102)	H
320	Email from Liang to Castleberry, Druk, Chennamaraja, Phipps, Fitzpatrick, and Siddiqui re: Akira Technologies, Inc.’s timely “Stage 2” offer for Public Website and Intranet Website and HHS Evaluation Database Application (Solicitation no. 14-233-SOL-00490.pdf, with Attachments Technical Merit – 14-233-SOL-00490 – Akira – FINAL.pdf, Pricing – 14-233-SOL-00490 – Akira – FINAL.pdf, SF30 – 14-233-SOL-00490 – Akira – FINAL.pdf, HHS Section 508 Evaluation Template – 14-233-SOL-00490 – Akira – FINAL.pdf, 9/22/14	H

Number	Description	Obj
	(AKIRA 135103-60)	
321	Skype message exchange between Liang and Mikhachuk, 9/23/14 (DEF 11245)	A
322	Email chain among Liang, Hoffman, Accounting, Chennamaraja, Mikhachuk, Fitzpatrick, Castleberry, Phipps, and Sidiqii re: Fwd: Akira Technologies, Inc.'s timely "Stage 1" offer for Public Website and Intranet Website and HHS Evaluation Database Application (Solicitation no. 14-233-SOL-00490), with Attachment HHSP233201400160A BASE SIGNED.pdf, 9/12/14-9/25/14 (AKIRA 135219-34)	H
323	Email from Castleberry to Liang, Druk, Chennamaraja, Phipps, Fitzpatrick, and Sidiqii re: PSC 14-233-SOL-00490 Award Notification, with Attachment HHSP233201400227A BASE AKIRA.pdf, 9/30/14 (AKIRA 135235-74)	H
324	Text message exchange of Sep. 30, 2014 between Fitzpatrick and Mikhachuk (DEF 11167)	A, R
325	Email chain between Mikhachuk and Chennamaraja re: Re: Your bonus, 10/16/14-11/10/14 (AKIRA 134071-3)	
326	Sales by Customer Detail, January through December 2014 (AKIRA 138107)	U
327	Email chain between Mikhachuk and Chennamaraja re: Re: Your bonus, 10/16/14-1/6/15 (AKIRA 134081-4)	
328	Redline of Proposal for Public Website and Title X Clinic Database Redesign & Related Services, Concept Paper (AKIRA 242246-57)	
329	Sales by Customer Detail, January through December 2015 (AKIRA 138108)	U
330	Sales by Customer Detail, January through December 2015 (AKIRA 138110-1)	U
331	Sales by Customer Detail, January through December 2016 (AKIRA 138109)	U
332	Skype message exchange between Liang and Mikhachuk, 3/3/15 (DEF 11246)	A

Number	Description	Obj
333	Email from Liang to Wilds, Hernandez, Young, Taylor, Fitzpatrick, Munley cc: Chennamaraja and Mikhachuk re: Re: All USDA RFP on CIO CS, 9/23/15 (AKIRA 6235-6)	H
334	Skype message exchange between Mikhachuk and Liang, 9/23/15 (DEF 8787)	A, M
335	Email chain among Liang, Mikhachuk, Wood, Chennamaraja, Dunbar, Sidiqii, Keenan, Howerton, and Ford re: Fwd: USDA/FSA Cloud Hosting Services Requirement, with Attachments CIO-CS Instructions to Offerors for USDA FSA Cloud-Based Hosting (003).docx and USDA Cloud Hosting CIO-CS.docx, 9/23/15 (AKIRA 6237-51)	H, R
336	Email from Chennamaraja to Mathur, Khalil, and Mikhachuk re: Platform for CEDSCI, 9/24/15 (AKIRA 6253)	R
337	Email chain between Wood and Mikhachuk re: Re: Use this one, with Attachment USDA Cloud Hosting CIO-CS.docx, 9/24/15 (AKIRA 133698-707)	H,R
338	Email from Liang to Chennamaraja cc: Dunbar, Phipps, Wood, Mikhachuk re: Re: FW: Questions concerning FSA USDA Cloud Hosting RFP with images, 9/25/15 (AKIRA 7232-44)	H
339	Email chain among Mikhachuk, Liang, Chennamaraja, Dunbar, Phipps, Wood, Keenan, Ford, and Howerton re: RE: FW: Questions concerning FSA USDA Cloud Hosting RFP, 9/24/15-9/25/15 (AKIRA 7245-58)	H
340	Proposal for Cloud-Based Internet and Intranet Hosting, Volume I: Technical Proposal, 9/25/15 (AKIRA 245621-43)	R
341	Email from Liang to Mikhachuk re: Fwd: Introductions (re: USDA FSA cloud migration), 10/1/15 (AKIRA 7291-2)	H, R
342	Email from Joshi to Wood, Mikhachuk, Liang, Chennamaraja re: USDA Cloud migration – Internal Kick off, 10/6/15 (AKIRA 7301)	H, R

Number	Description	Obj
343	Email from Mikhalchuk to Chennamaraja cc: Wood re: Will's time for USDA, 10/27/15 (AKIRA 7794)	R
344	Sales by Customer Detail, January through December 2015 (AKIRA 138134-5)	U
345	Email chain among Joshi, USDA_FSA group, and Groisman re: Re: usda-fsa – new group has been created, with Attachments USDA FSA Cloud Migration – AG-3151-D-15-0194 (fully executed contract).pdf, Volume II Pricing Workbook – CS-22189-8A – Akira Technologies.xlsx, Volume II Business Proposal – CS-22189-8A – Akira Technologies.pdf, Volume I Technical Proposal – CS-22189-8A	H
	– Akira Technologies.pdf, Akira Questions for Revised FSA SOW V4.docx, WSO AMC 12182015 CIO-CS PWS for USDA FSA Cloud- Based Hosting.docx, 1/22/16 (AKIRA 137795-874)	
346	Email chain between Liang and Phipps re: Re: please send the final word and excel documents for the USDA volumes, 1/22/16 (AKIRA 159279-82)	
347	Email chain among Chennamaraja, Liang, Mikhalchuk, Khanna, and USDA FSA re: RE: Amended LOE, 1/23/16 (AKIRA 152190-4)	H
348	Email chain among Mikhalchuk, Liang, Chennamaraja, Khanna, and USDA FSA re: RE: Amended LOE, 1/23/16 (AKIRA 152185-9)	H
349	Email chain among Khanna, Liang, Chennamaraja, Mikhalchuk, and USDA FSA re: Re: Amended LOE, 1/23/16 (AKIRA 152203-7)	H
350	Proposal for Cloud-Based Internet and Intranet Hosting, Volume I: Technical Proposal, 2/8/16 (AKIRA 245496-23)	R
351	Sales by Customer Detail, January through December 2016 (AKIRA 138136-7)	U
352	Email chain between Chennamaraja, Liang, and Fitzpatrick re: Re: Starting the ball rolling on an “away from Paul” discussion about the VAR business, 2/13/14 (AKIRA 253673-4)	H

Number	Description	Obj
353	Email from Liang to Roth re: Re: FW: Andrey's signed offer letter, 11/6/16 (AKIRA 7724-8)	H
354	Email from A. Mikhalkuk to S. Roth re: Re: Offer letter, 11/7/16 (AKIRA 100278-80)	
355	Plaintiff's Responses to Defendant Andrey Mikhalkuk's First Set of Requests for Admissions (portions admitted)	
356	Plaintiff's Supplemental Responses to Defendant Joshua Phipps' First Set of Requests for Admissions (portions admitted)	
357	Plaintiff's Response to Lisa Houle's First Set of Requests for Admissions (portions admitted)	
358	Defendant Conceptant, Inc.'s First Set of Requests for Admissions to Plaintiff Akira Technologies, Inc.	
359	Plaintiff/Counter-Defendant, Akira Technologies, Inc.'s Responses to Defendant/Counter-Plaintiff, Andrey Mikhalkuk's, Second Set of Interrogatories	

Plaintiff specifically reserves for trial objections pursuant to Fed. R. Evid. 402 or 403.

Respectfully Submitted,

AKIRA TECHNOLOGIES, INC.

Dated: March 15, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document by filing it with the CM/ECF system, which then sent notice and the document to counsel for defendant at the addresses below:

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Dated March 15, 2018

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